

# **EXHIBIT B**

**TO THE DECLARATION OF ADA K. WONG IN SUPPORT  
OF PLAINTIFF'S MOTION TO COMPEL DISCOVERY  
RESPONSES AND FOR ATTORNEY'S FEES**

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JILLIAN HORMAN, an individual,  
  
Plaintiff,

v.

SUNBELT RENTALS, INC., a Washington  
State Entity; "DOE(S) 1-100", employees of  
SUNBELT RENTALS, INC.; and  
"CORPORATION(S) XYZ 1-100,"  
  
Defendants.

Case No. 2:20-cv-00564-TSZ

**PLAINTIFF'S FIRST SET OF  
REQUESTS FOR PRODUCTION TO  
DEFENDANT SUNBELT RENTALS,  
INC.**

TO: SUNBLET RENTALS, INC., Defendant

AND TO: SHANE P. CRAMER, PATRICIA J. HILL and YASH B. DAVE, Counsel for  
Defendant

SET NO.: ONE

Plaintiff Jillian Horman, in her individual capacity herein, hereby serves these Requests  
for Production upon Defendant Sunbelt Rentals, Inc.

***THIS IS A REQUEST FOR PRODUCTION, PURSUANT TO FED. R. CIV. P. 34.***

Please produce requested items for inspection and copying at the offices of Ada K.  
Wong, AKW Law, P.C., 6100 219<sup>th</sup> Street SW, Suite 480, Mountlake Terrace, WA 98043,

1 Plaintiff JILLIAN HORMAN. Such complaints or concerns may be formal or informal, verbal  
2 or written.

3 **RESPONSE:**  
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6 **REQUEST FOR PRODUCTION NO. 7:**

7 Please produce a copy of all documents, including but not limited to notes, memoranda,  
8 letters, e-mails, etc. regarding Defendant SUNBELT RENTALS, INC. firing Plaintiff and any  
9 documents that formed part or all of the basis of the firing of Plaintiff JILLIAN HORMAN.

10 **RESPONSE:**  
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13 **REQUEST FOR PRODUCTION NO. 8:**

14 Please produce all of Defendant SUNBELT RENTALS, INC.'s employee handbooks  
15 and personnel manuals in effect at any time from June 1, 2018 to present, including all addenda,  
16 handouts, and acknowledgements.

17 **RESPONSE:**  
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20 **REQUEST FOR PRODUCTION NO. 9:**

21 Please produce all documents referring, regarding, and/or related to compensation,  
22 fringe benefits, and perks offered and/or provided to Plaintiff JILLIAN HORMAN during her  
23 employment with Defendant SUNBELT RENTALS, INC. This includes but is not limited to

**REQUEST FOR PRODUCTION NO. 15:**

Please produce a copy of all documents identified or referenced in, or that describe or contain the communications identified in, Defendant SUNBELT RENTALS, INC.'s answer to Interrogatory No. 15.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 16:**

For each expert identified in Defendant SUNBELT RENTALS, INC.'s answer to Interrogatory No. 16, please produce:

- (a) The expert's complete file in this case, including, without limitation, all notes, reports, drafts of reports or other documents relating to communications and correspondence with counsel or other concerning this case;
- (b) A list of all publications authored, in whole or in part, by the expert within the preceding ten years, as well as copies of the publications, per se;
- (c) Any and all documents contained data or other information considered by the expert in forming his/her opinions; and
- (d) Any exhibits to be used as a summary of or support for the opinions.

**RESPONSE:**

1 **RESPONSE:**

4 **REQUEST FOR PRODUCTION NO. 20:**

5 Please produce a copy of any and all documents relating to or regarding any  
6 investigations conducted by Defendant SUNBELT RENTALS, INC. identified or referenced  
7 in Defendant SUNBELT RENTALS, INC.'s answer to Interrogatory No. 20.

8 **RESPONSE:**

11 **REQUEST FOR PRODUCTION NO. 21:**

12 Please produce a copy of any and all documents relating to or regarding any private  
13 investigator investigations identified or referenced in Defendant SUNBELT RENTALS,  
14 INC.'s answer to Interrogatory No. 21.

15 **RESPONSE:**

18 **REQUEST FOR PRODUCTION NO. 22:**

19 Please produce all investigations, including conclusions, correspondence, memoranda,  
20 notes, text messages, audio and video recordings, findings, statements, interviews, etc.,  
21 regarding complaints of discrimination on the basis of sex, gender, and/or disability; hostile  
22 work environment on the basis of sex, gender, and/or disability; failure to accommodate a  
23 disability; and retaliation for complaining about discrimination or harassment on the basis of

1 sex, gender, and/or disability or requesting a disability accommodation by employees, agents,  
2 and/or independent contractors of Defendant SUNBELT RENTALS, INC. for the last five (5)  
3 years.

4 **RESPONSE:**  
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7 **REQUEST FOR PRODUCTION NO. 23:**

8 Please produce a copy of all documents related to or referencing all complaints made  
9 by Plaintiff JILLIAN HORMAN to Defendant SUNBELT RENTALS, INC. regarding  
10 discrimination on the basis of sex, gender and/or disability, harassment on the basis of sex,  
11 gender, and/or disability, disability accommodations, and/or retaliation.

12 **RESPONSE:**  
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15 **REQUEST FOR PRODUCTION NO. 24:**

16 Please produce a copy of all documents, notes, audio or video recordings,  
17 correspondence, memoranda, e-mails, letters, paperwork, files or other communications  
18 maintained by Defendant SUNBELT RENTALS, INC. regarding, referring to, and/or related  
19 to Plaintiff JILLIAN HORMAN's requests, applications, questions, and intent to request  
20 reasonable accommodations.

21 **RESPONSE:**  
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**REQUEST FOR PRODUCTION NO. 25:**

Please produce a copy of any and all documents relating to or regarding all disability accommodations that Defendant SUNBELT RENTALS, INC. considered for and/or offered to Plaintiff.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 26:**

Please produce a copy of any and all documents relating to or regarding each communication between Defendant SUNBELT RENTALS, INC. and Plaintiff JILLIAN HORMAN that Defendant SUNBELT RENTALS, INC. used to seek and share information to achieve the best match between Plaintiff's capabilities and available accommodations and/or positions at Defendant SUNBELT RENTALS, INC.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 27:**

Please produce a copy of all documents, notes, audio or video recordings, correspondence, memoranda, e-mails, letters, files or other communications maintained by Defendant SUNBELT RENTALS, INC. regarding, referring to, and/or related to Plaintiff JILLIAN HORMAN's job performance.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 33:**

Please produce any and all communications regarding the matters alleged in Plaintiff JILLIAN HORMAN's Complaint between Defendant SUNBELT RENTALS, INC. (including its employees, agents, independent contractors, staff, and/or personnel) and Plaintiff, including text messages, emails, letters, etc.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 34:**

Please produce any and all communications regarding the matters alleged in Plaintiff JILLIAN HORMAN's Complaint between Defendant SUNBELT RENTALS, INC. (including its employees, agents, independent contractors, staff, and/or personnel) and any person and/or entity, including text messages, emails, letters, etc.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 35:**

Please produce all documents regarding, referring to and/or related to Defendant SUNBELT RENTALS, INC.'s policies or procedures as related to the retention and keeping of e-mail accounts for employees and past employees from June 1, 2018, including all documents regarding, referring, or related to how Defendant SUNBELT RENTALS, INC.



**CERTIFICATE OF SERVICE**

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On June 16, 2020, I caused a copy of the foregoing to be served on the parties listed below in the manner specified below:

Shane P. Cramer Harrigan Leyh Farmer & Thomsen LLP 999 Third Avenue, Suite 4400 Seattle, WA 98104 E-mail: <a href="mailto:shanec@harriganleyh.com">shanec@harriganleyh.com</a> Attorneys for Defendant Sunbelt Rentals, Inc.	<input type="checkbox"/>	VIA FACSIMILE
	<input type="checkbox"/>	VIA FIRST CLASS U.S. MAIL
	<input type="checkbox"/>	VIA MESSENGER/HAND DELIVERY
	<input checked="" type="checkbox"/>	<b>VIA E-MAIL/E-FILE</b> <b><i>Per 5/21/2020 Stipulation</i></b> <b><i>Regarding Electronic Service</i></b>
Patricia J. Hill Yash B. Dave Smith, Gambrell & Russell, LLP 50 North Laura Street, Suite 2600 Jacksonville, FL 32202 E-mail: <a href="mailto:pjhill@sgrlaw.com">pjhill@sgrlaw.com</a> E-mail: <a href="mailto:ydave@sgrlaw.com">ydave@sgrlaw.com</a> E-mail: <a href="mailto:cmars@sglaw.com">cmars@sglaw.com</a> Pro hac vice Counsel for Defendant Sunbelt Rentals, Inc.	<input type="checkbox"/>	VIA FACSIMILE
	<input type="checkbox"/>	VIA FIRST CLASS U.S. MAIL
	<input type="checkbox"/>	VIA MESSENGER/HAND DELIVERY
	<input checked="" type="checkbox"/>	<b>VIA E-MAIL/E-FILE</b> <b><i>Per 5/21/2020 Stipulation</i></b> <b><i>Regarding Electronic Service</i></b>

Dated June 16, 2020, at Mountlake Terrace, Washington.

/s/ Kaila A. Eckert

Kaila A. Eckert, Paralegal